

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Mahmoud KHALIL, Petitioner,

v.

Donald J. TRUMP, in his official capacity
as President of the United States; William P.
JOYCE, in his official capacity as Acting
Field Office Director of New York,
Immigration and Customs Enforcement;1
Caleb VITELLO, Acting Director, U.S.
Immigration and Customs Enforcement;
Kristi NOEM, in her official capacity as
Secretary of the United States Department of
Homeland Security; Marco RUBIO, in his
official capacity as Secretary of State; and
Pamela BONDI, in her official capacity as
Attorney General, U.S. Department of
Justice.,

Case No. 2:25-cv-1963-MEF

**MOTION OF INTERNATIONAL LAW PROFESSORS, EXPERTS, PRACTITIONERS,
AND SCHOLARS FOR LEAVE TO FILE AN *AMICI CURIAE* BRIEF IN SUPPORT OF
PETITIONER'S MOTION FOR A PRELIMINARY INJUNCTION**

International law professors, experts, practitioners and scholars, listed in full below,
respectfully move before the Honorable Michael E. Farbiarz, United States District Judge at the
Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ, for an order
granting leave to file a brief *amicus curiae* in support of the petitioner's Motion for a preliminary
injunction in the above-captioned proceeding as soon as practicable based upon the parties

proposed schedule (ECF 84) but no later than the regular April 21, 2025 motion day. Counsel for Petitioners and Respondents have been contacted and do not take a position on this motion.

INTEREST OF *AMICI CURIAE*

Amici curiae are international law and human rights professors, experts, practitioners, and scholars. *Amici* respectfully submit this brief to provide the Court with analysis of the international law issues at stake in this case. *Amici* have a strong interest in the outcome of this case and its impacts on human rights. *Amici* are profoundly concerned that this case threatens universal human rights protected by international law, including the rights to opinion, expression, association, and assembly on a nondiscriminatory basis. Some *Amici* themselves fear retaliation for exercising these rights, including in relation to signing onto this amicus. *Amici* know other similarly qualified individuals who wanted to join in this brief, but felt that they could not do so for fear of retaliation, including arrest or deportation.

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Amici respectfully request that the Court grant leave to file the attached *amicus* brief in support of Plaintiffs' Opposition to the Government's Statement of Interest.

DATED: March 26, 2025

Respectfully submitted
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